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8 UNITED STATES DISTRICT COURT  
9 NORTHERN DISTRICT OF CALIFORNIA

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12 **In re: High-Tech Employee Antitrust  
13 Litigation**

14 This Document relates to:

15 **All Actions**

Master Docket No. 11-CV-2509-LHK

**Declaration of Joseph R. Saveri Regarding  
Compliance with the Court's June 5, 2012  
Case Management Order**

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I, Joseph R. Saveri, declare as follows:

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1. I am the Founding Partner of the Saveri Law Firm. I am one of the Court-  
appointed Interim Co-Lead Counsel for Plaintiff Class in this matter. I previously appeared in this  
matter on behalf of Plaintiffs during the time in which I was a partner at the law firm of Lieff,  
Cabraser, Heimann & Bernstein, LLP. I submit this Declaration Regarding Compliance with the  
Court's June 5, 2012 Case Management Order. If called as a witness, I could and would testify  
competently to them.

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electronic sources, including electronic mail and other web based systems operated by third parties.

3       3. I have reviewed the Declaration of Dean Harvey Regarding Compliance with the  
4 Court's June 5, 2012 Case Management Order. I can attest to the accuracy of the facts stated in  
5 the Harvey Declaration. In particular, based upon my review of Defendants' discovery requests,  
6 my participation in meet and confer sessions with Defendants as to the requests and my  
7 personal involvement in Plaintiffs' counsels' efforts to comply with those requests, I reasonably  
8 believe that Plaintiffs completed their investigation and believe, based upon that investigation,  
9 that Plaintiffs have identified, gathered and produced all responsive, non-privileged documents  
10 on Friday, June 15, 2012. If it comes to my attention that there are any documents which have  
11 not been produced, they will be produced promptly.

12 I declare under penalty of perjury, under the laws of the United States, that the foregoing  
13 is true and correct and that this Declaration is executed on June 18, 2012 at San Francisco,  
14 California.

By: */s/ Joseph R. Saveri*  
Joseph R. Saveri